

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

IN RE:)
)
DAVID KENT REED) CASE NO. 25-00425-JMC-7
)
DEBTOR.)

**TRUSTEE’S MOTION FOR TURNOVER
AND NOTICE OF OBJECTION DEADLINE**

Joanne Friedmeyer, Trustee (the “Trustee”) for the bankruptcy estate (the “Estate”) of David Kent Reed (“Debtor”), by counsel herein, respectfully requests that the court compel the Debtor to turn over property of the bankruptcy estate, and documents relating thereto, pursuant to Section 541 and 542 of Title 11 of the United States Code (the “Bankruptcy Code”), and in support hereof states as follows:

JURISDICTION

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157(b)(2)(E) and 1334 and the General Orders of the United States District Court for the Southern District of Indiana referring all cases and proceedings arising under or related to Title 11 to the United States Bankruptcy Court.

BACKGROUND

2. The Debtor filed his bankruptcy petition and schedules initiating the above-captioned matter (the “Petition”) on January 29, 2025 (the “Petition Date”), along with his bankruptcy schedules [Doc. No. 1] (the “Schedules”).

3. The Trustee requests the Debtor be ordered to turn over the following documents:

(a.) the original Indiana certificate of title for the 2010 Aluma Trailer referenced in Debtor’s Schedules;

(b.) the original Indiana certificate of title for the 2017 Aluma Trailer referenced in Debtor’s Schedules;

(c.) the original Indiana certificate of title for the 2020 GMC Sierra referenced in Debtor's Schedules, if said title is in Debtor's possession, custody or control;

(d.) original certificates of title for any other unencumbered titled vehicles or trailers owned by Debtor as of the Petition Date.

(collectively, the "Titles").

RELIEF REQUESTED

5. The Trustee hereby requests that this Court enter an order requiring the Debtor to turn over the Titles.

GROUND FOR GRANTING THE REQUESTED RELIEF

6. The Documents relate to property of the Bankruptcy Estate. Pursuant to 11 U.S.C. §§323 and 704, the Trustee serves as representative of the Debtor's Estate, with the duty to collect and reduce to money all property of the estate, defined in 11 U.S.C. §541 to include "all legal or equitable interests of the debtor in property as of the commencement of the case."

7. 11 U.S.C. §§323 and 542 provide that the Trustee may bring an action to compel turnover by any entity in possession, custody or control of property of the Estate, or documents relating thereto.

NOTICE IS GIVEN that any objection to this Motion must be filed with the Bankruptcy Clerk within **21 days** from the date of service [or such other time period as may be permitted by pursuant to Fed.R. Bankr.P. 9006(f)]. Those not required or not permitted to file electronically must deliver any objection by U.S. mail, courier, overnight/express mail, or in person at:

United States Bankruptcy Court
Bankruptcy Clerk
116 U.S. Courthouse
46 E. Ohio Street
Indianapolis, IN 46204

The objecting party must ensure delivery of the objection to the Trustee. **If an objection is NOT timely filed, the requested relief may be granted.**

WHEREFORE, the Trustee respectfully requests the Court issue an order granting this Motion and directing the Debtor to turn over to the Trustee the Titles within fourteen (14) days of the date of entry of such order.

MULVEY LAW LLC
Attorneys for Trustee

By: /s/Joseph L. Mulvey
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was served via the Court's ECF electronic filing system on this 18th day of August, 2025 and on the following by U.S. Mail:

David Kent Reed
50 N. Depot Street
New Palestine, IN 46163

/s/ Joseph L. Mulvey
Joseph L. Mulvey